

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

V.

RUSSELL LUCIUS LAFFITTE

EXHIBIT AND WITNESS LIST

Case Number: 9:22 – CR-00658

PRESIDING JUDGE The Honorable Richard M. Gergel					PLAINTIFF'S ATTORNEYS Emily Limehouse, AUSA Winston Holliday, AUSA Katie Stoughton, AUSA	DEFENDANT'S ATTORNEY Bart Daniel, Esq. Matt Austin, Esq.
TRIAL DATE (S) November 8-22, 2022					COURT REPORTER Karen Andersen	COURTROOM DEPUTY Crystal Perry
GOVT. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES	
					Norris Laffitte	
					Jeanne Seckinger	
					Jan Malinowski	
					Ronnie Crosby	
					Alania Plyler	
					Hannah Plyler	
					Cyndra Swinson	
					Spann Laffitte	
					Lucius Laffitte	
					Becky Laffitte	
					Timothy Rich – FDIC Expert	
					Mark Altman	
					Natasha Thomas	
					Brian Womble	
					Arthur Badger	
1					July 20, 2021 Board Meeting Minutes (101424)	
2					August 9, 2021 Email from N Laffitte to Exec Comm & Board (98947)	
3					Original Report to Board re AM Financial Exposure (98961)	
4					August 12, 2021 Executive Committee Minutes (101443)	
5					Updated Report to Board re AM Financial Exposure (98962)	
6					August 17, 2021 Board Meeting Minutes (101427)	
7					August 18 to Sept. 3 Email Chain (165928)	

7a				August 18 Email from RLL to Board re charged off loans (165931)
7b				August 26 N. Laffitte Response to RLL re AM financials (165931)
7c				RL response to N. Laffitte re: AM financials (165931)
7d				Sept. 2 Email re: Collateral for \$750,000 Loan (165930)
7e				Sept. 2 Response re: Collateral for \$750,000 Loan (165929)
7f				L. Malinowski Email re: Collateral for \$750,000 Loan (165929)
7g				RLL Response to L. Malinowski re: Collateral (165928)
8a				Red Beard Promissory Note (6933)
8b				Red Beard Collateral Statement (7045)
8c				Red Beard Collateral (7045)
8d				Red Beard Request for Verification of Stock Signed by RLL (7149)
9a				0 United Promissory Note (5643)
9b				0 United Collateral Statement (5645)
9c				0 United Collateral (5645)
9d				0 United RLL Signature (5793)
9e				0 United Green Swamp Certificate (5795)
10				\$750,000 Beach House Loan Documents (11943)
10a				Beach House Loan Promissory Note (11945)
10b				Beach House Loan Business Purpose Statement (11953)
10c				Beach House Loan Collateral Description (11959)
10d				Beach House Loan Collateral Inquiry (11955)
10e				Beach House Loan \$400,000 General Ledger Debit (11989)
10f				Beach House Loan Disbursement Authorization (11985)
10g				Beach House Loan Wiring Instructions (11991)
10h				Beach House Loan Sticky Note and Loan Proceeds (11993)
10i				Beach House Loan Domestic Wire Request (11995)
10j				Beach House Loan Summary and Approval (12003)
10k				Beach House Loan Summary and Approval (2) (12005 – top page)
10l				Beach House Loan Approval Times (12011- mid page)
10m				Beach House Loan Risk Grade Analysis (12013)
10n				Beach House Loan Exception Sheet (12043)
11				Sept. 6 Email Chain from RLL re: AM Resignation (166051)
11a				Sept. 6 RLL Notification to Board re: AM Resignation (166053)

11b					Sept. 6 N. Laffitte Response (166051)
11c					Sept. 6 Gibson Response (166051)
12					Oct. 29 Email Chain re: \$680,000 Payment (98927)
12a					Oct. 29 RLL to Board re: \$680,000 Payment (98930)
12b					Oct. 29 L. Malinowski Response (98930)
12c					Oct. 29. RLL Response to L. Malinowski (98929)
12d					Oct. 29 N. Laffitte Response to RLL (98929)
13					Oct. 29 RLL Response to N. Laffitte (161761)
14					\$680,000 Check (126013)
14a					\$680,000 Check with JS Notes (152838)
15					Dec. 1 Email Chain re: Pinckney/Thomas (165888)
15a					Dec. 1 Email from RLL to Board re: Pinckney/Thomas (165889)
15b					Dec. 1 N. Laffitte Response re: Pinckney/Thomas (165889)
15c					Dec. 1 RLL Response to N Laffitte re Pinckney/Thomas (165888)
16					Pinckney/Thomas Checks (74373)
17					PMPED Colored Checks (152801)
18					Alania Plyler Disbursement Sheet (125330)
19					Hannah Plyler Disbursement Sheet (125355)
19a					Angela Plyler Estate Disbursement Sheet (125334)
19b					Angela Plyler Probate Disbursement Sheet (125323)
19c					Angela Plyler Disbursement Sheet (Ford)
19d					Justin Plyler Estate Disbursement Sheet
20					Natasha Thomas Disbursement Sheet (74627)
21					Natasha Thomas Disbursement Sheet 2 (74589)
22					Hakeem Pinckney Disbursement Sheet (74783)
23					Arthur Badger Disbursement Sheet (74428)
24					Estate of Donna Badger Disbursement Sheet (74806)
25					Estate of Donna Badger Disbursement Sheet (2) (74804)
26					Sept. 17, 2012 Email re: RLL as PR of Badger (152846)
27					Nov. 19 Email re: AM Meeting at PSB (152847)
28					Badger Settlement Check Signed by RLL (74802)
29					Badger Checks (126015)
30					Badger Checks Summary

31					\$709,586.45 Check Marked Lost Form (152852)
32					Natasha Thomas \$325,000 Check (74521)
33					Natasha Thomas \$25,245.08 Check (74522)
33a					Email regarding \$25,245.08 Check
34					Hakeem Pinckney \$309,581.46 Check (74374)
35					Pinckney/Thomas Checks Negotiated (74375)
36					Pinckney/Thomas Checks Summary Chart
36a					Thomas \$25,245.08 Check Summary Chart
37					February 6, 2013 Email from AM to RLL re: Badger Check (128484)
38					February 6, 2013 Email from RLL to AM re: Badger Check (128824)
39					February 6, 2013 Email with RLL Notes (126195)
40					September 9, 2011 Email from AM to RL re call and Meeting (128496)
41					September 12, 2011 Email from AM to RLL re: Meeting (128497)
42					September 12, 2011 Email from AM to RLL re \$100k Loan (128498)
43					September 14, 2011 Email Chain re: Meeting for Loan (128502)
44					October 25, 2011 Email Chain re: Transfer to MM for Shopping (128510)
45					Nov. 1, 2011 Email RLL to AM re: Charge Off 0 United and RedBeard (128512)
46					Nov. 14, 2011 Email re: Meeting to Discuss Berk Props (128514)
47					Dec. 12, 2011 Email re: Payment of Redbeard and 0 United (128516)
48					Dec. 20, 2011 Email re: Call Me (Pinckney/Thomas) (128517)
49					Dec. 27, 2011 Email re: Payment of 0 United and Redbeard (128518)
49a					Dec. 30, 2011 Email re: Meeting at Bank (128520)
50					Oct. 22, 2015 Email from AM to RLL re: HP Loan Repayment (161915)
51					Oct. 28, 2013 Email AM to RLL re: Southern Crane Wire Transfer (128490)
52					Oct. 28, 2013 Email AM to RLL re: Southern Crane Wire Attachment (128491)
53					March 26, 2014 Email from RLL to AM re: Overdraft (128577)
54					March 27, 2014 Email from RLL to AM re: Give Me a Call (128578)
55					March 27, 2014 Email from AM to RLL re: HP Turning 18 (161917)
56					March 28, 2014 Email from RLL to AM re: Overdraft (128579)
57					Feb. 23, 2015 Email re: HP Loan Repayment and LOC (161922)
58					March 30, 2015 Email from AM to RLL re: Increase LOC (161924)
59					July 24, 2015 Email re: Transfer from LOC to Cover Overdraft (128569)
60					Feb. 27, 2016 Email re: Transfer from LOC to Cover Overdraft (128565)

61				March 30, 2020 Email re: Loan 74 Days Past Due (161919)
62				Feb. 19, 2021 Email from RLL to AM re: Debit Account (161921)
63				Lending Limits (99023)
64				Aug. 2006 to June 2021 PSB Bylaws (162492)
65				June 2021 Amended PSB Bylaws (162512)
66				PSB Conflicts of Interest Policy (162573)
67				FDIC Certificate (188481)
70				July 13, 2021 Executive Committee Meeting Minutes (101441)
71				April 15, 2009 Email Introducing Provence to RLL
72				August 12, 2021 Executive Committee Notes re: AM Loans (99026)
73				DDA Non-Posted Transaction Reports (166080)
74				October 28, 2021 Email from RLL to Executive Committee (116729)
74a				October 28 2021 Response from JM (116729)
75				October 28, 2021 Email Exchange with S. Swain (99695)
75a				October 28, 2021 S. Swain Response (99695)
75b				October 28, 2021 RLL Response to S. Swain (99695)
76				October 28, 2021 \$680,000 Transaction Details (163857)
77				October 28, 2021 \$680,000 Transaction Details (163858)
78				October 29, 2021 \$680,000 Transaction Details (163859)
79				November 4, 2021 \$680,000 Transaction Details (163860)
80				November 2, 2021 Email Chain with RLL and T. Walker
81				July 16, 2021 Email from RLL re: Title Work (165952)
82				\$400,000 Check Issued to AM (163856)
83				Aug. 9, 2021 RLL Inquiry re \$400,000 (98949)
84				Compliance One Loan Sequencing Document (98951)
85				AM Check for Lyttleton Deposited Feb. 4, 2013 (165874)
86				Lyttleton Check Complete Transaction (165875)
87				\$500,000 LOC Docs – Loan 6986998 (128003)
87a				\$500,000 LOC Promissory Note (128004)
87b				\$500,000 LOC Business Purpose Statement (128010)
87c				\$500,000 LOC Loan Review Sheet (128162)
88				\$500,000 LOC Advances (159247)
89				\$85,000 and \$6,500 Advances Record (159248)

90					\$90,000 and \$8,500 Advances Record (159249)
91					\$17,477.98 Advance Record (159251)
92					\$7,734.50 Advance Record (159246)
93					\$284,787.52 Advance Record (159250)
94					\$284,787.52 Cashier's Check to South State (159242)
95					\$284,787.52 Check (159241)
95a					\$284,787.52 Cashier's Check to South State Endorsed RLL (159243)
96					\$284,787.52 March 23, 2015 Deposit (159244)
97					DVD - \$1,000,000 LOC – Loan 6987336 (10099)
97a					\$1M LOC Documents
98					\$1,000,000 LOC – Loan 6987336 Advance Record (159057)
99					Loan 6987336 – March 14, 2018 \$40,000 Advance to AM (159050)
100					Loan 6987336 – April 24, 2018 \$20,000 Advance to AM (159051)
101					Loan 6987336 – May 2, 2018 \$3,500 Advance to MM (159053)
102					Loan 6987336 – May 29, 2018 \$25,000 Advance to AM (159054)
103					DVD - Hannah Plyler Probate File
104					July 21, 2008 Email Re: Plyler Allowance Approval (164273)
105					Hannah Plyler File Closing Checklist (164270)
106					Alaina Plyler File Closing Checklist (164276)
107					Malik Williams Disbursement Sheet (87035)
108					Malik Williams Probate File (86991)
109					Hakeem Pinckney Probate File (86924)
110					Natasha Thomas Probate File (86966)
111					October 11, 2011 Email from AM to RLL re: Pinckney (161911)
112					Badger Approval of Settlement Records (74792)
113					Jan. 12, 2011 Bank transfer for Disney (88479)
114					Add Verizon Line (88500)
115					Nov. 30, 2011 Promissory Note (88527)
116					March 11, 2011 Order Allowing Purchases (88548)
117					2011 Bank Statement (88549)
118					Sept. 11, 2012 Loan # 091112 Balance (88615)
119					Nov. 20, 2012 Arthur Badger PR Fee Check (88631)
119a					Nov. 21, 2012 Badger Fee Payment to HP (126211)

120					2012 Bank Statement (88634)
121					2012 Russell Laffitte Checks (88644)
122					2012 Russell Laffitte Checks to AM (88646)
123					April 20, 2009 Order Allowing Purchases (88708)
124					2007-2010 H. Plyler Bank Statement (88711)
125					2009-2010 Bank Statement (88735)
126					H. Plyler 2014-2015 Accounting Summary (88776)
127					April 20, 2015 Order Allowing Conservator Payment (88778)
128					March 23, 2015 Order Allowing Conservator Payment (88784)
129					2011 H. Plyler Accounting Summary (88785)
130					2012-2014 Alex Loans (88804)
131					2011-2015 Russell Loans (88806)
132					2014-2015 Bank Statement (88867)
133					May 18, 2010 Order Allowing Purchases (88925)
134					2009 H. Plyler Accounting Summary (88927)
135					2007-2010 H. Plyler Bank Statement (88931)
136					Nov. 16, 2006 Rickie L Plyler Renunciation of Right as PR (89047)
137					Nov. 16, 2006 RL Petition for Appointment of Conservator (89048)
138					March 30, 2007 Russell Laffitte Fiduciary Letters (89051)
139					Dec. 13, 2007 PR Probate Accounting Submission (89065)
140					May 7, 2008 Petition for Expenditures (89073)
141					July 5, 2011 Order Allowing Conservator Payment (89090)
142					March 23, 2015 Order Allowing Conservator Payment (89095)
143					April 20, 2015 Receipt \$251,956.26 (89101)
144					Dec 22, 2008 Petition for Expenditure re HP Mini Netbook PC (89104)
145					Staples Ad for HP Mini Netbook PC (89105)
146					Oct 28, 2008 Petition for Expenditure \$300 for Clothes (89108)
147					April 21, 2015 Order of Discharge (89112)
148					Feb 28, 2013 H. Plyler Letter re Vehicle Purchase (89124)
149					Mar 29, 2013 Laffitte Conservator Personal Savings Acct (89136)
150					Feb 21, 2013 Laffitte Conservator Interest Checking Account (89149)
151					2013 Bank Statement (89173)
152					Feb 26, 2013 Money Market Acct Statement (89176)

153					Parker Loan to RLL Documents (1) (164511)
154					Parker Loan to RLL Documents (2) (164315)
160					AM PSB 1646 Farm Account Records
161					AM PSB 6092 Account Records
162					AM PSB 6649 Account Records
163					AM & MM PSB Account 5109
164					Plyler Conservatorship Account 9431
165					PSB Conservatorship Account 9509
166					RLL South State Bank Account Records 1499
167					RLL Loans Worksheet
168					7.15.11 Loan to RLL (0126280)
169					9.28.12 Loan to RLL (0126204)
169a					Page 9 of 9.28.12 Loan to RLL (126212)
170					11.16.12 Loan to RLL (0126261)
171					12.27.13 Loan to RLL (0126772)
172					RLL Summary PPT
176					AM Loans Worksheet
178					9.11.12 Loan to AM (0126185)
179					2.12.13 Loan to AM (0126039)
180					5.28.13 Loan to RLL (0126136)
181					6.14.13 Loan to RLL (0126143)
182					7.29.13 Loan to AM (0126153)
183					9.27.13 Loan to AM (0126196)
184					10.23.13 Loan to AM (0126218)
185					11.5.13 Loan to AM (0126228)
186					12.6.13 Loan to AM (0126266)
187					3.28.14 Loan to AM (0126058)
188					5.06.14 Loan to AM (0126099)
189					AM Summary PPT
190					AM Overdraft Status and Transfer Summary Chart PDF
191					PSB General Loan Policy (186815)
192					AM Records Summary – June to Sept. 2021
194					Badger Consent Order to Substitute PR (154418)

195					\$83,719.73 Settlement Check (74633)
195a					\$83,719.73 Settlement Check Deposited 12/21/2011 (118576)
196					Natasha Thomas Lawyer Loan (101386)
197					Employee Security Access Requests – RLL (159005)
198					Womble Testimony Summary PPT
200					RLL ODC Transcript (6/22/22 and 6/24/22)
200a					RLL ODC Transcript 2 (7/26/22)
200b					RLL ODC Transcript (7/26/22 – pages 104-105)
201					Sept. 6, 2022 Bond Hearing Transcript
211					AM Acct. Record Showing C. Laffitte Loan Deposit (186658)
212					Natasha Thomas Release
213					Hakeem Pinckney Release
214					Pinckney/Thomas Conservator Fee Checks
215					PMPED General Ledger N. Thomas
216					PMPED General Ledger H. Pinckney
217					Aug. 9 Director Record – RLL Access AM 6092
218					Badger Probate Records (154348)
218a					RLL Petition for Appointment in Badger (154385)
218b					RLL Appointment as PR (154388)
218c					Petition to Approve Settlement (154405)
218d					Termination of Appointment (154416)
218e					AB Resignation of Appointment (154384)
218f					Verification of Petition for Approval of Settlement (154395)
219					PMPED General Ledger A. Badger
220					Aug. 9 RLL Access to AM Account
221					Status of AM Loans
222					July 19, 2021 Email from Chris Wilson (152825)
223					Redacted Transcript - PSB November 3 2021 Board Meeting